

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	
	)	Chapter 11
	)	
Reading Eagle Company, <i>et al.</i> , <sup>1</sup>	)	Case No. 19-11728-REF
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF ENTRY OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

**PLEASE TAKE NOTICE THAT** the attorneys listed below hereby appear as counsel for MediaNews Group, Inc. ("MediaNews") and MNG-RE Acquisition LLC ("MNG-RE"), in the chapter 11 cases of the above-captioned debtors and debtors in possession (the "Debtors"). Under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") and pursuant to Rules 2002, 3017(a), 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Bankruptcy Code sections 342 and 1109(b), MediaNews and MNG-RE request that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in these cases, be transmitted to:

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<sup>1</sup> The last four digits of Debtor Reading Eagle Company's tax identification number are 3740. The last four digits of Debtor WEEU Broadcasting Company's tax identification number are 8488.


**PLEASE TAKE FURTHER NOTICE THAT** this request includes, without limitation, not only the notices and papers referred to in the provisions specified above, but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that (1) affects or seeks to affect in any way the rights or interests of MediaNews, MNG-RE or any other party in interest in these cases, including (a) the Debtors, (b) property of the Debtors or the Debtors' estates, or proceeds thereof, (c) claims against or interests in the Debtors, (d) other rights or interests of creditors of the Debtors or other parties in interest in this case or (e) property or proceeds thereof in the possession, custody, or control of MediaNews, MNG-RE or others that the Debtors may seek to use or (2) requires or prohibits, or seeks to require or prohibit, any act, delivery of any property, payment or other conduct by MediaNews, MNG-RE or any other party in interest.

**PLEASE TAKE FURTHER NOTICE THAT**, in accordance with Bankruptcy Rule 3017(a), this request also constitutes a request in writing for copies of any disclosure statement or plan filed in these cases.

**PLEASE TAKE FURTHER NOTICE THAT** neither this notice of appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of MediaNews or MNG-RE (1) to have final orders in non-core matters entered only after *de novo* review by a higher court, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal or (4) to any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: May 21, 2019  
Wilmington, Delaware

PEPPER HAMILTON LLP

  
/s/ David M. Fournier

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-and-

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